

## Andrew Spivack

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**From:** Andrew Spivack  
**Sent:** Tuesday, August 15, 2023 9:44 AM  
**To:** Michael D. Sayles, Esq.  
**Cc:** Cassondra Emanuel  
**Subject:** RE: BK Case #21-12675-amc | Larry Robinson | Certification of Default - Hearing 6/27/2023  
**Attachments:** RE: BK Case #21-12675-amc | Larry Robinson | Certification of Default - Hearing 6/27/2023

Mike

I already sent yesterday and I sent them originally by email. According to Bankruptcy Rules no discovery should be filed on the docket

Andrew Spivack  
Partner  
Bankruptcy  
866-519-1889

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**From:** Michael D. Sayles, Esq. <midusa1@comcast.net>  
**Sent:** Tuesday, August 15, 2023 9:36 AM  
**To:** Andrew Spivack <Andrew.Spivack@brockandscott.com>  
**Subject:** Re: BK Case #21-12675-amc | Larry Robinson | Certification of Default - Hearing 6/27/2023

Andy-

Following up yesterday request.

I didn't receive a copy of the RFA or RFD by mail & the documents have not been electronically filed. Kindly send copies by email of RFA & RFD today. Thanks.

Sincerely,

Mike Sayles

Sent from my iPhone

On Aug 14, 2023, at 7:41 AM, Michael D. Sayles, Esquire <[midusa1@comcast.net](mailto:midusa1@comcast.net)> wrote:

Hi Andy-

Could you please send me a copy of the request for admissions & request for production of documents this morning. Thanks.

Thanks,

Mike Sayles

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**From:** Andrew Spivack <[Andrew.Spivack@brockandscott.com](mailto:Andrew.Spivack@brockandscott.com)>  
**Sent:** Friday, August 11, 2023 9:39 AM  
**To:** [midusa1@comcast.net](mailto:midusa1@comcast.net)  
**Cc:** Cassandra Emanuel <[Cassandra.Emanuel@brockandscott.com](mailto:Cassandra.Emanuel@brockandscott.com)>  
**Subject:** Re: BK Case #21-12675-amc | Larry Robinson | Certification of Default - Hearing 6/27/2023

Hi Mike

This hearing is coming up -- does your client have the funds to cure the arrears or not?

**Andrew Spivack**  
Partner  
Bankruptcy

—  
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[Andrew.Spivack@brockandscott.com](mailto:Andrew.Spivack@brockandscott.com)  
Licensed in PA, NJ & MD

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**From:** Andrew Spivack <[Andrew.Spivack@brockandscott.com](mailto:Andrew.Spivack@brockandscott.com)>  
**Sent:** Wednesday, July 26, 2023 9:41 AM  
**To:** [midusa1@comcast.net](mailto:midusa1@comcast.net) <[midusa1@comcast.net](mailto:midusa1@comcast.net)>  
**Cc:** Cassandra Emanuel <[Cassandra.Emanuel@brockandscott.com](mailto:Cassandra.Emanuel@brockandscott.com)>  
**Subject:** RE: BK Case #21-12675-amc | Larry Robinson | Certification of Default - Hearing 6/27/2023

Hi Mike

Sorry I am away until Monday. The issue here is that the debtor is delinquent so I want to know does the debtor have the funds to cure. My client isn't going to do another stip on a stip so the debtor needs to cure or we have to press. Please let me know does the debtor have the funds to cure the arrears

[Andrew Spivack](#)  
[Partner](#)  
[Bankruptcy](#)  
[866-519-1889](#)

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**From:** Michael D. Sayles, Esq. <[midusa1@comcast.net](mailto:midusa1@comcast.net)>  
**Sent:** Tuesday, July 25, 2023 4:43 PM  
**To:** Andrew Spivack <[Andrew.Spivack@brockandscott.com](mailto:Andrew.Spivack@brockandscott.com)>  
**Subject:** RE: BK Case #21-12675-amc | Larry Robinson | Certification of Default - Hearing 6/27/2023

Hi Andrew,

Attached, please find monthly mortgage statements from July 2022 to June 2023. I like to review these invoices with you before the request for admissions & documents is due next week. Please advise.

Sincerely,

Michael Sayles



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